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JAN 29 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0128-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF THE RESPONSES TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE PROJECT SPECIFIC PLAN FOR PREDESIGN CHARACTERIZATION OF SEDIMENTS IN PADDYS RUN AND ASSOCIATED DRAINAGE FEATURES, REVISION 0

References:
1. Letter DOE-0070-04, W. Taylor to J. Saric and T. Schneider, "Transmittal of the Project Specific Plan for Predesign Characterization of Sediments in Paddys Run and Associated Drainage Features," dated December 4, 2003
2. Letter, J. Saric to J. Reising, "Paddys Run and Drainage PSP," dated December 24, 2003
3. Letter, T. Schneider to J. Reising, "Comments – PSP for Predesign Characterization of Sediments in Paddys Run and Associated Drainage Features," dated January 7, 2004

Enclosed for your review and approval are the responses to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) comments on the Project Specific Plan for Predesign Characterization of Sediments in Paddys Run and Associated Drainage Features. Upon your approval, these comment responses will be incorporated into Revision 1 of this plan and resubmitted for your approval.

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,

William J. Taylor
Director

FCP:Reising

Enclosures: As Stated

cc w/enclosures:
J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosures)
G. Jablonowski, USEPA-V, SR-6J
M. Cullerton, Tetra Tech
F. Bell, ATSDR
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:
K. Johnson, OH/FCP
J. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS1
F. Miller, Fluor Fernald, Inc./MS64
D. Powell, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

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RESPONSES TO U.S. AND OHIO ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENTS ON PROJECT SPECIFIC PLAN FOR PREDESIGN CHARACTERIZATION OF SEDIMENTS IN PADDYS RUN AND ASSOCIATED DRAINAGE FEATURES

FERNALD CLOSURE PROJECT
FERNALD, OHIO

JANUARY 2004

U.S. DEPARTMENT OF ENERGY

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RESPONSES TO U.S. ENVIRONEMENTAL PROTECTION AGENCY COMMENTS ON PROJECT SPECIFIC PLAN FOR PREDESIGN CHARACTERIZATION OF SEDIMENTS IN PADDYS RUN AND ASSOCIATED DRAINAGE FEATURES

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Pg.#: NA Line #: NA Code: C
Original General Comment #: 1

Comment: The plan indicates that sediment samples will be collected from 0 to 0.5 foot depth intervals but also indicates that deeper core samples could be collected if deeper sediment deposits are encountered. However, the plan does not provide criteria or procedures for collecting samples deeper than the 0 to 0.5 foot interval. The text should be revised to provide these criteria and procedures. Moreover, the criteria and procedures should be developed and applied for the transect sampling, entry channel sampling, debris location sampling and biased sampling activities

Response: Agree. The plan will be revised to include procedures and criteria for depth sampling at the inner most locations on the transects beyond sharp bends where deposits are likely, at the first location of each entry channel, and at each debris location. See also OEPA Comment #5.

Action: Section 2 and Appendix B will be revised to include sampling at the 0-0.5', 0.5'-1.0', and 1.0'-1.5' depth intervals at the innermost locations on the transects beyond sharp bends where deposits are likely, at the first location of each entry channel, and at each debris location.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.5.2.1 Pg.#: 2-7 Line #: 1 and 2 Code: C
Original Specific Comment #: 1

Comment: The text states that the depth interval for sediment samples will be 0 to 0.5 foot but that in some cases deeper core samples will be required. The text should be revised to provide the criteria and procedures for collecting sediment samples deeper than the 0 to 0.5 foot interval. Also, in the event that multiple 6-inch core samples are collected at one sampling location, the text should be revised to clarify whether all the core samples will be analyzed for all the area-specific constituents of concern.

Response: Agree. See response to General Comment 1.

Action: See action for General Comment 1.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.5.2.1 Pg.#: 2-7 Line #: 5 and 6 Code: C
Original Specific Comment #: 2

Comment: The text states that sampling activities will be suspended if anomalous materials or possible fill areas are discovered. The text should be revised to provide a contingency plan for delineating the depth and areal extent of any fill areas discovered during sampling activities.

Response: Agree.

Action: If a geologist determines the presence of fill, additional cores will be taken to determine the lateral extent of the fill and documented a V/FCN. Depending on the thickness of the fill one or more intervals will be collected of the fill for the full list of COCs identified in this PSP. The boring will be advanced until native soil is obtained and the top 6 inches of native soil will be sampled for the full list of COCs identified in this PSP.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.0 Pg.#: 3-1 Line #: 10 Code: C
Original Specific Comment #: 3
Comment: The text states that all borings will be completed to a depth of 6 inches. However, other sections of the plan state that sediment samples may be collected from deeper intervals. As stated in General Comment 1, the text should be revised to provide the criteria and procedures for collecting sediment samples deeper than the 0 to 0.5 foot interval.
Response: Agree. See response to General Comment 1.
Action: See action for General Comment 1.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4-1 Pg.#: 4-1 Line #: 9 and 10 Code: C
Original Specific Comment #: 4
Comment: The text states that one trip blank will be collected each day that samples for volatile organic compound (VOC) analysis are collected or that one trip blank will be collected for each 20 samples collected for VOC analysis, whichever is more frequent. The text should be revised to state that one trip blank will be collected and shipped in each cooler containing samples for VOC analysis.
Response: Agree.
Action: Revise the text to state: "One trip blank will be taken each day that volatile organic compound (VOC) samples are collected, or one per 20 VOC samples that are collected, or one per cooler that will be shipped, whichever is more frequent."

RESPONSES TO OHIO ENVIRONEMENTAL PROTECTION AGENCY COMMENTS ON PROJECT SPECIFIC PLAN FOR PREDESIGN CHARACTERIZATION OF SEDIMENTS IN PADDYS RUN AND ASSOCIATED DRAINAGE FEATURES

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Pg.#: Line #: NA Code: E
Original Comment #: 1
Comment: On all future documents, please submit documents containing line numbers to facilitate the review and comments, as has been done in the past.
Response: Agree. Line numbers were inadvertently left off.
Action: All documents that are submitted for review and approval will contain line numbers.

Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.1 Pg.#: 2-2 Line #: NA Code: E
Original Comment #: 2
Comment: "sough" should be "south"
Response: Agree.
Action: "sough" will be changed to "south"

Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.1 Pg.#: 2-2 Line #: NA Code: C
Original Comment #: 3
Comment: The acronym SSLD is used in the last paragraph and is not defined in the acronym list. No one in our office is familiar with this acronym. Please define.
Response: This was a typographical error for SSOD.
Action: "SSLD" will be changed to "SSOD"

Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.5.2.1 Pg.#: 2-6 Line #: NA Code: C
Original Comment #: 4
Comment: The statement made that "if there is too much water to perform the sampling, the location will be moved north of south away from the nearest transect..." The presence of a pool of water is indicative of a depositional area and is the most likely area to locate contamination. Moving the sample location is not advised and some means of obtaining the sample from the depositional area is preferred. Devices are available to obtain cores from the bottom of Lake Erie, so obtaining a sample should not be beyond any technical limitation.
Response: This statement was intended for Paddys Run only as the other two main streams rarely pool in any areas. Since Paddys Run is extremely dynamic, potential depositional areas can change often. Every attempt will be made to sample within three feet of all planned locations with the equipment available. If all attempts fail, only then will the location be moved in such a manner that obtains a sample in the deepest part of the pooled water and can be done safely and with the current available equipment.
Action: Revised the text to state: "If the water is too deep to perform the sampling, the location will be moved north or south away from the nearest transect in such a manner that obtains a sample in the deepest part of the pooled water that can be sampled safely and with the current available equipment."

Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.5.2.1 Pg.#: 2-7 Line #: NA Code: C
Original Comment #: 5
Comment: Reference is made to taking samples from 0-0.5' in most cases with some deeper cores being required. Review of the sample information in Appendix B shows only the three RTB samples (page B-14) as having depths greater than 0.5'. There is, however, a high probability that legacy contamination deposited in the old streambed would be covered with greater than 0.5' of recent material. On page 2-3 of the document, this seems to be recognized by the statement, "if contamination is present it is also most likely buried

beneath clean layers of more recent deposition". We agree that it is less likely that any contamination in the active channel would be found at depths greater than 6". However, areas outside of the channel may have more material in the overburden. Areas of likely deposition (as stated in the document "areas immediately downstream of sharp bends..." and at confluences) should be sampled at greater depth. The criteria stated in 2.5.2.1 on page 2-7 could apply to the appropriate depth, as determined by a geologist at these locations (e.g., depositional material offering from non-depositional soils).

Response: Agree. The borings located in the old Paddys Run streambed will be advanced deeper than 0.5 feet. Three distinct intervals will be collected in these borings, 0-0.5', 0.5-1.0', and 1.0-1.5'.

Action: Appendix B will be changed to add the additional intervals.

Commenting Organization: Ohio EPA Commentor: DSW
Section #: NA Pg.#: NA Line #: NA Code: C
Original Comment #: 6

Comment: A draft figure with contamination above the FRL in the SSOD was provided to us. Please be sure to include this in the PSP.

Response: Agree.

Action: The figure will be included in the document.

Commenting Organization: Ohio EPA Commentor: DSW
Section #: Table 2-2 Pg.#: 2-11 Line #: NA Code: C
Original Comment #: 7

Comment: The third sample listed on the chart (PR166) is listed as a sediment FRL exceedance. According to the sediment FRL on Table 2-1, this sample does not exceed the FRL. The sediment FRL for Radium-226 is 2.9 pCi/g as listed in Table 2-1. The sampling result for PR166 in Table 2-2 is 2.3. If this is correct, this entry in the table should be removed.

Response: Agree.

Action: The sample will be removed from the table.

Commenting Organization: Ohio EPA Commentor: DSW
Section #: Figure 2-7 Pg.#: NA Line #: NA Code: C
Original Comment #: 8

Comment: The transect interval for sampling in the Pilot Plant Drainage Ditch seems excessive. It would seem that more transects placed in areas of deposition along the ditch would be most appropriate. This ditch would not experience the same dynamic changes that Paddys Run would and the depositional areas were more likely to remain the same over time. For example, from the NPDES 4005 sampling point, there are two places to the east that are likely depositional areas, i.e., the pool at NPDES and an additional pool downstream of there. There is also a depositional area just upstream of the culvert emptying into the pool at NPDES 4005. It appears, from the figure, that PPDDT-3 may be in the area of the PPDD that was moved to accommodate the widening of the road around OU4. If so, there is little likelihood of locating any legacy contamination here, and the transect should be moved appropriately.

Response: Agree.

Action: PPDDT-1 will be moved approximately 225' west and PPDDT-2 and PPDDT-3 will be removed altogether. PPDDT-4, which is in the same locality as NPDES 4005 and is currently located on the west side of the culvert, will be moved to the east side of the culvert. PPDT-5 will remain in the same location.